

SERFF Tracking Number: SECB-128535494 State: Arkansas
 Filing Company: Security Benefit Life Insurance Company State Tracking Number:
 Company Tracking Number: V6022A
 TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
 Product Name: Variflex GMIR
 Project Name/Number: /

Filing at a Glance

Company: Security Benefit Life Insurance Company

Product Name: Variflex GMIR

SERFF Tr Num: SECB-128535494 State: Arkansas

TOI: A03I Individual Annuities - Deferred Variable

SERFF Status: Closed-Approved- State Tr Num:
Closed

Sub-TOI: A03I.002 Flexible Premium

Co Tr Num: V6022A

State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Author: Greg Garhart

Disposition Date: 07/09/2012

Date Submitted: 07/02/2012

Disposition Status: Approved-

Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name:

Status of Filing in Domicile: Pending

Project Number:

Date Approved in Domicile:

Requested Filing Mode:

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Individual Market Type:

Overall Rate Impact:

Filing Status Changed: 07/09/2012

State Status Changed: 07/09/2012

Deemer Date:

Created By: Greg Garhart

Submitted By: Greg Garhart

Corresponding Filing Tracking Number:

Filing Description:

V6022A (7-12) Variable Annuity Contract Specification Page

V6022A (7-12)U Variable Annuity Contract Specification Page

V6023A (7-12) Variable Annuity Contract Specification Page

V6023A (7-12)U Variable Annuity Contract Specification Page

Dear Sir or Madam:

We hereby submit the above-referenced Variable Annuity Contract Specification Pages for your review and approval. The forms are new and will not replace any other forms currently on file.

SERFF Tracking Number: SECB-128535494 State: Arkansas
 Filing Company: Security Benefit Life Insurance Company State Tracking Number:
 Company Tracking Number: V6022A
 TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
 Product Name: Variflex GMIR
 Project Name/Number: /

The Specification Pages are being submitted to permit us to set the fixed account guaranteed interest rate in accordance with the model index formula set forth in your law. Forms V6022A (7-12) and V6022A (7-12)U may be issued with Individual Flexible Premium Deferred Variable Annuity Contracts V6022 (10-94) and V6022 (10-94)U which were approved by your department on July 1, 1996. Forms V6023A (7-12) and V6023A (7-12)U may be issued with Individual Flexible Premium Deferred Variable Annuity Contracts V6023 (1-98) and V6023 (1-98)U which were approved by your department on March 6, 1998.

Please note that certain portions of the forms have been bracketed. The forms may be used for qualified and non-qualified contracts.

Your prompt attention to this matter is greatly appreciated.

State Narrative:

Company and Contact

Filing Contact Information

Greg Garhart, Compliance Analyst II greg.garhart@securitybenefit.com
 One Security Benefit Place 800-888-2461 [Phone] 3203 [Ext]
 Topeka, KS 66636-0001 785-368-1391 [FAX]

Filing Company Information

Security Benefit Life Insurance Company	CoCode: 68675	State of Domicile: Kansas
One Security Benefit Place	Group Code: 870	Company Type: Life
Topeka, KS 66636	Group Name:	State ID Number:
(800) 888-2461 ext. 3203[Phone]	FEIN Number: 48-0409770	

Filing Fees

Fee Required? Yes
 Fee Amount: \$100.00
 Retaliatory? No
 Fee Explanation: \$50 x 2 forms
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Security Benefit Life Insurance Company	\$100.00	07/02/2012	60603379
Security Benefit Life Insurance Company	\$100.00	07/02/2012	60609986

SERFF Tracking Number: SECB-128535494 State: Arkansas

Filing Company: Security Benefit Life Insurance Company State Tracking Number:

Company Tracking Number: V6022A

TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium

Product Name: Variflex GMIR

Project Name/Number: /

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	07/09/2012	07/09/2012

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
EFT	Note To Reviewer	Greg Garhart	07/02/2012	07/02/2012

SERFF Tracking Number: *SECB-128535494* *State:* *Arkansas*
Filing Company: *Security Benefit Life Insurance Company* *State Tracking Number:*
Company Tracking Number: *V6022A*
TOI: *A03I Individual Annuities - Deferred Variable* *Sub-TOI:* *A03I.002 Flexible Premium*
Product Name: *Variflex GMIR*
Project Name/Number: */*

Disposition

Disposition Date: 07/09/2012

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: SECB-128535494 State: Arkansas
 Filing Company: Security Benefit Life Insurance Company State Tracking Number:
 Company Tracking Number: V6022A
 TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
 Product Name: Variflex GMIR
 Project Name/Number: /

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Form	Variable Annuity Contract Specification Page		Yes
Form	Variable Annuity Contract Specification Page		Yes
Form	Variable Annuity Contract Specification Page		Yes
Form	Variable Annuity Contract Specification Page		Yes

SERFF Tracking Number: *SECB-128535494* *State:* *Arkansas*
Filing Company: *Security Benefit Life Insurance Company* *State Tracking Number:*
Company Tracking Number: *V6022A*
TOI: *A03I Individual Annuities - Deferred Variable* *Sub-TOI:* *A03I.002 Flexible Premium*
Product Name: *Variflex GMIR*
Project Name/Number: */*

Note To Reviewer

Created By:

Greg Garhart on 07/02/2012 04:00 PM

Last Edited By:

Linda Bird

Submitted On:

07/09/2012 11:32 AM

Subject:

EFT

Comments:

I miscalculated the original EFT amount and have submitted additional EFT fees to make up the difference. I apologize for the error.

SERFF Tracking Number: SECB-128535494 State: Arkansas

Filing Company: Security Benefit Life Insurance Company State Tracking Number:

Company Tracking Number: V6022A

TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium

Product Name: Variflex GMIR

Project Name/Number: /

Form Schedule

Lead Form Number: V6022A (7-12)

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	V6022A (7-12)	Data/Declaration PagesContract Specification Page	Initial			V6022A (7-12).pdf
	V6022A (7-12)U	Data/Declaration PagesContract Specification Page	Initial			V6022A (7-12)U.pdf
	V6023A (7-12)	Data/Declaration PagesContract Specification Page	Initial			V6023A (7-12).pdf
	V6023A (7-12)U	Data/Declaration PagesContract Specification Page	Initial			V6023A (7-12)U.pdf

VARIABLE ANNUITY CONTRACT SPECIFICATIONS

OWNER NAME:

[Jane Doe]

OWNER DATE OF BIRTH:

[October 5, 1960]

JOINT OWNER NAME:

[]

JOINT OWNER DATE OF BIRTH:

[]

ANNUITANT NAME:

[Jane Doe]

ANNUITANT DATE OF BIRTH:

[October 5, 1960]

ANNUITANT'S SEX:

[Female]

PRIMARY BENEFICIARY NAME:

[Jenny Doe]

CONTRACT NUMBER:

[123456789]

CONTRACT DATE:

[July 1, 1999]

ISSUE DATE:

[July 1, 1999]

ANNUITY START DATE*:

[July 1, 2009]

PLAN:

[Non-Qualified]

ASSIGNMENT:

This Contract may [not] be assigned. See assignment provision.

INITIAL PURCHASE PAYMENT..... \$[10,000]
MINIMUM SUBSEQUENT PURCHASE PAYMENT \$[1000]
MINIMUM SYSTEMATIC WITHDRAWAL \$[25]
MORTALITY AND EXPENSE RISK CHARGE.....[1.25]% annually
ADMINISTRATION CHARGE [.15]% annually
GUARANTEED FIXED ACCOUNT RATE [1-3]%
ANNUITY OPTION..... Life with 10 Year Fixed Period Option*

SUBACCOUNTS:

[

American Century VP Ultra®
American Century VP Value
Dreyfus IP Technology Growth
Dreyfus VIF International Value
Guggenheim VT All Cap Value
Guggenheim VT Alpha Opportunity
Guggenheim VT High Yield
Guggenheim VT Large Cap Concentrated Growth
Guggenheim VT Large Cap Core
Guggenheim VT Large Cap Value
Guggenheim VT Managed Asset Allocation
Guggenheim VT Mid Cap Growth
Guggenheim VT Mid Cap Value
Guggenheim VT Money Market
Guggenheim VT MSCI EAFE Equal Weight
Guggenheim VT Small Cap Growth

Guggenheim VT Small Cap Value
Guggenheim VT U.S. Intermediate Bond
Guggenheim VT U.S. Long Short Momentum
Invesco V.I. Global Health Care
Invesco V.I. Global Real Estate
Invesco V.I. Government Securities
Invesco V.I. International Growth
Invesco V.I. Mid Cap Core Equity
Invesco Van Kampen V.I. Comstock
Invesco Van Kampen V.I. Equity and Income
Invesco Van Kampen V.I. Mid Cap Growth
Invesco Van Kampen V.I. Value Opportunities
Legg Mason ClearBridge Variable Aggressive Growth
Legg Mason ClearBridge Variable Small Cap Growth
MFS® VIT Research International

MFS® VIT Total Return
MFS® VIT Utilities
Neuberger Berman AMT Socially Responsive
Oppenheimer Main Street Small- & Mid-Cap
Fund®/VA
PIMCO VIT All Asset
PIMCO VIT CommodityRealReturn Strategy

PIMCO VIT Foreign Bond (U.S. Dollar-Hedged)
PIMCO VIT Low Duration
PIMCO VIT Real Return
Royce Micro-Cap]

METHOD FOR DEDUCTIONS:

Deductions for Premium Taxes, and any unallocated partial withdrawals, including Systematic Withdrawals, will be made from the Accounts in the same proportion that the Contract Value is allocated among the accounts.

* The Owner may select the Annuity Start Date and the Annuity Option. If no Annuity Start Date or Annuity Option is selected by the Owner, they will be assigned automatically.

VARIABLE ANNUITY CONTRACT SPECIFICATIONS

OWNER NAME:

[Jane Doe]

OWNER DATE OF BIRTH:

[October 5, 1960]

JOINT OWNER NAME:

[]

JOINT OWNER DATE OF BIRTH:

[]

ANNUITANT NAME:

[Jane Doe]

ANNUITANT DATE OF BIRTH:

[October 5, 1960]

PRIMARY BENEFICIARY NAME:

[Jenny Doe]

CONTRACT NUMBER:

[123456789]

CONTRACT DATE:

[July 1, 1999]

ISSUE DATE:

[July 1, 1999]

ANNUITY START DATE*:

[July 1, 2009]

PLAN:

[Non-Qualified]

ASSIGNMENT:

This Contract may [not] be assigned. See assignment provision.

INITIAL PURCHASE PAYMENT \$[10,000]
MINIMUM SUBSEQUENT PURCHASE PAYMENT \$[1000]
MINIMUM SYSTEMATIC WITHDRAWAL \$[25]
MORTALITY AND EXPENSE RISK CHARGE [1.25]% annually
ADMINISTRATION CHARGE [.15]% annually
GUARANTEED FIXED ACCOUNT RATE [1-3]%
ANNUITY OPTION Life with 10 Year Fixed Period Option*

SUBACCOUNTS:

[

American Century VP Ultra®
American Century VP Value
Dreyfus IP Technology Growth
Dreyfus VIF International Value
Guggenheim VT All Cap Value
Guggenheim VT Alpha Opportunity
Guggenheim VT High Yield
Guggenheim VT Large Cap Concentrated Growth
Guggenheim VT Large Cap Core
Guggenheim VT Large Cap Value
Guggenheim VT Managed Asset Allocation
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Guggenheim VT U.S. Intermediate Bond

Guggenheim VT U.S. Long Short Momentum
Invesco V.I. Global Health Care
Invesco V.I. Global Real Estate
Invesco V.I. Government Securities
Invesco V.I. International Growth
Invesco V.I. Mid Cap Core Equity
Invesco Van Kampen V.I. Comstock
Invesco Van Kampen V.I. Equity and Income
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Legg Mason ClearBridge Variable Aggressive Growth
Legg Mason ClearBridge Variable Small Cap Growth
MFS® VIT Research International
MFS® VIT Total Return
MFS® VIT Utilities
Neuberger Berman AMT Socially Responsive

Oppenheimer Main Street Small- & Mid-Cap
Fund®/VA
PIMCO VIT All Asset
PIMCO VIT CommodityRealReturn Strategy
PIMCO VIT Foreign Bond (U.S. Dollar-Hedged)

PIMCO VIT Low Duration
PIMCO VIT Real Return
Royce Micro-Cap]

METHOD FOR DEDUCTIONS:

Deductions for Premium Taxes, and any unallocated partial withdrawals, including Systematic Withdrawals, will be made from the Accounts in the same proportion that the Contract Value is allocated among the accounts.

* The Owner may select the Annuity Start Date and the Annuity Option. If no Annuity Start Date or Annuity Option is selected by the Owner, they will be assigned automatically.

VARIABLE ANNUITY CONTRACT SPECIFICATIONS

OWNER NAME:

[Jane Doe]

OWNER DATE OF BIRTH:

[October 5, 1960]

JOINT OWNER NAME:

[]

JOINT OWNER DATE OF BIRTH:

[]

ANNUITANT NAME:

[Jane Doe]

ANNUITANT DATE OF BIRTH:

[October 5, 1960]

ANNUITANT'S SEX:

[Female]

PRIMARY BENEFICIARY NAME:

[Jenny Doe]

CONTRACT NUMBER:

[123456789]

CONTRACT DATE:

[July 1, 1999]

ANNUITY COMMENCEMENT DATE*:

[July 1, 2009]

PLAN:

[Non-Qualified]

ASSIGNMENT:

This Contract may [not] be assigned. See assignment provision.

INITIAL PURCHASE PAYMENT	\$[10,000]									
MINIMUM SUBSEQUENT PURCHASE PAYMENT	[\$500] (\$[50] under an automatic investment program)									
MINIMUM SYSTEMATIC WITHDRAWAL	[\$25]									
MAXIMUM ANNUITANT AGE	90									
MORTALITY AND EXPENSE RISK CHARGE	[1.20]% annually									
ANNUAL ADMINISTRATION FEE	[\$30]**									
WITHDRAWAL CHARGE										
Contract Year of Withdrawal	1	2	3	4	5	6	7	8	9+	
Withdrawal Charge	8%	7%	6%	5%	4%	3%	2%	1%	0%	
FREE WITHDRAWAL PERCENTAGE	[10]%									
GUARANTEED RATE	[1-3]%									
ANNUITY OPTION	Life with 10 Year Fixed Period Option*									
SEPARATE ACCOUNT	Variflex									

SEPARATE ACCOUNT SERIES:

[

American Century VP Ultra®
American Century VP Value
Dreyfus IP Technology Growth
Dreyfus VIF International Value
Guggenheim VT All Cap Value
Guggenheim VT Alpha Opportunity
Guggenheim VT High Yield

Guggenheim VT Large Cap Concentrated Growth
Guggenheim VT Large Cap Core
Guggenheim VT Large Cap Value
Guggenheim VT Managed Asset Allocation
Guggenheim VT Mid Cap Growth
Guggenheim VT Mid Cap Value
Guggenheim VT Money Market

Guggenheim VT MSCI EAFE Equal Weight
 Guggenheim VT Small Cap Growth
 Guggenheim VT Small Cap Value
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 Invesco V.I. Global Health Care
 Invesco V.I. Global Real Estate
 Invesco V.I. Government Securities
 Invesco V.I. International Growth
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 Invesco Van Kampen V.I. Value Opportunities
 Legg Mason ClearBridge Variable Aggressive
 Growth

Legg Mason ClearBridge Variable Small Cap
 Growth
 MFS® VIT Research International
 MFS® VIT Total Return
 MFS® VIT Utilities
 Neuberger Berman AMT Socially Responsive
 Oppenheimer Main Street Small- & Mid-Cap
 Fund®/VA
 PIMCO VIT All Asset
 PIMCO VIT CommodityRealReturn Strategy
 PIMCO VIT Foreign Bond (U.S. Dollar-Hedged)
 PIMCO VIT Low Duration
 PIMCO VIT Real Return
 Royce Micro-Cap]

METHOD FOR DEDUCTIONS:

Deductions for the Annual Administration Fee, Premium Taxes, and any unallocated partial Withdrawals, including Systematic Withdrawals, will be made from the Accounts in the same proportion that the Contract Value is allocated among the accounts.

* The Owner may select the Annuity Commencement Date and the Annuity Option. If no Annuity Commencement Date or Annuity Option is selected by the Owner, they will be assigned automatically.

** The Annual Administrative Fee is deducted at each Contract Anniversary. A pro rata fee is deducted: (1) upon a full Withdrawal of Contract Value; (2) when a Contract has been in force for less a full calendar year; (3) upon the Annuity Commencement Date if one of Annuity Options 1 through 4, 7 or 8 is chosen; and (4) upon payment of a death benefit. The Annual Administrative Fee will be waived during a Contract Year if: (1) Contract Value on that Contract Anniversary (or in the event of a full Withdrawal, upon the date of such Withdrawal) is \$25,000 or more; and (2) the Contract has been in force eight Contract Years or more.

VARIABLE ANNUITY CONTRACT SPECIFICATIONS

OWNER NAME:

[Jane Doe]

OWNER DATE OF BIRTH:

[October 5, 1960]

JOINT OWNER NAME:

[]

JOINT OWNER DATE OF BIRTH:

[]

ANNUITANT NAME:

[Jane Doe]

ANNUITANT DATE OF BIRTH:

[October 5, 1960]

PRIMARY BENEFICIARY NAME:

[Jenny Doe]

CONTRACT NUMBER:

[123456789]

CONTRACT DATE:

[July 1, 1999]

ANNUITY COMMENCEMENT DATE*:

[July 1, 2009]

PLAN:

[Non-Qualified]

ASSIGNMENT:

This Contract may [not] be assigned. See assignment provision.

INITIAL PURCHASE PAYMENT	\$[10,000]									
MINIMUM SUBSEQUENT PURCHASE PAYMENT	[\$500] (\$[50] under an automatic investment program)									
MINIMUM SYSTEMATIC WITHDRAWAL	[\$25]									
MAXIMUM ANNUITANT AGE	90									
MORTALITY AND EXPENSE RISK CHARGE	[1.20]% annually									
ANNUAL ADMINISTRATION FEE	[\$30]**									
WITHDRAWAL CHARGE										
Contract Year of Withdrawal	1	2	3	4	5	6	7	8	9+	
Withdrawal Charge	8%	7%	6%	5%	4%	3%	2%	1%	0%	
FREE WITHDRAWAL PERCENTAGE	[10]%									
GUARANTEED RATE	[1-3]%									
ANNUITY OPTION	Life with 10 Year Fixed Period Option*									
SEPARATE ACCOUNT	Variflex									

SEPARATE ACCOUNT SERIES:

[

American Century VP Ultra®
American Century VP Value
Dreyfus IP Technology Growth
Dreyfus VIF International Value
Guggenheim VT All Cap Value
Guggenheim VT Alpha Opportunity
Guggenheim VT High Yield
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 Legg Mason ClearBridge Variable Aggressive
 Growth
 Legg Mason ClearBridge Variable Small Cap
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MFS® VIT Research International
 MFS® VIT Total Return
 MFS® VIT Utilities
 Neuberger Berman AMT Socially Responsive
 Oppenheimer Main Street Small- & Mid-Cap
 Fund®/VA
 PIMCO VIT All Asset
 PIMCO VIT CommodityRealReturn Strategy
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 Royce Micro-Cap]

METHOD FOR DEDUCTIONS:

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** The Annual Administrative Fee is deducted at each Contract Anniversary. A pro rata fee is deducted: (1) upon a full Withdrawal of Contract Value; (2) when a Contract has been in force for less a full calendar year; (3) upon the Annuity Commencement Date if one of Annuity Options 1 through 4, 7 or 8 is chosen; and (4) upon payment of a death benefit. The Annual Administrative Fee will be waived during a Contract Year if: (1) Contract Value on that Contract Anniversary (or in the event of a full Withdrawal, upon the date of such Withdrawal) is \$25,000 or more; and (2) the Contract has been in force eight Contract Years or more.

SERFF Tracking Number: SECB-128535494 State: Arkansas
Filing Company: Security Benefit Life Insurance Company State Tracking Number:
Company Tracking Number: V6022A
TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
Product Name: Variflex GMIR
Project Name/Number: /

Supporting Document Schedules

	Item Status:	Status Date:
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Satisfied - Item: Flesch Certification

Comments:

Attachment:

Readability Certification.pdf

	Item Status:	Status Date:
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Bypassed - Item: Application

Bypass Reason: N/A

Comments:

	Item Status:	Status Date:
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Satisfied - Item: Life & Annuity - Acturial Memo

Comments:

Attachments:

Actuarial Memorandum V6022.pdf

Actuarial Memorandum V6023.pdf

CERTIFICATION

I hereby certify that the Flesch reading ease test score for each form as calculated in WORD is as follows:

Form	Readability Score
V6022A (7-12)	50.1*
V6022A (7-12)U	50.1*
V6023A (7-12)	53.2
V6023A (7-12)U	53.2

* scored with the base contract form V6022 (10-94)

SECURITY BENEFIT LIFE INSURANCE COMPANY



Chris Swickard,
Vice President, Associate General Counsel
and Assistant Secretary